

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**Re: ECF Nos. 24103, 23621,  
23612, and 21326.**

**This filing relates only to HTA**

**MOTION OF THE PUERTO RICO HIGHWAYS AND TRANSPORTATION  
AUTHORITY FOR LEAVE TO SUBMIT A SPANISH LANGUAGE EXHIBIT AND  
FOR EXTENSION OF TIME TO FILE A CERTIFIED TRANSLATION**

**To the Honorable United States District Judge Laura Taylor Swain:**

The Puerto Rico Highways and Transportation Authority (“HTA”), by and through the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as sole representative of HTA pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”)<sup>2</sup>, hereby submits this motion requesting the entry of an

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

<sup>2</sup> PROMESA is codified at 48 U.S.C. §§ 2101-2241.

order, substantially in the form of **Exhibit A** hereto (the “Proposed Order”), granting HTA leave to submit a Spanish-language exhibit in connection with the Objection (as defined below) being filed today and an extension of time to file a certified English-language translation, and in support thereof, respectfully alleges and prays as follows:

1. Today, HTA filed *The Puerto Rico Highways and Transportation Authority’s (1) Opposition to (A) Motion Requesting Payment of Severance Damages [ECF No. 23612], and (B) Amended Petition Requesting Payment of Severance Damages [ECF No. 24103], and (2) Reply to Response Filed by Claimant Adrián Mercado Jiménez [Ecf No. 21326] in Connection with the Four Hundred Fifty-Fourth Omnibus Objection (Non-Substantive) to Satisfied Claims* (the “Objection”).

2. In support of the arguments in the Objection, HTA attached as Exhibit 2 thereto the Judgment dated May 31, 2019, issued by the Commonwealth Court of Appeals in connection with Case K EF2011-0240, which is in its original Spanish language (the “Judgment”).

3. Despite diligent efforts, HTA was unable to obtain a certified English-language translation of the Judgment from its original Spanish language prior to today’s filing. Accordingly, HTA seeks leave from this Court to submit the Judgment in its original Spanish language and requests an extension of 3 business days, to and including May 10, 2023, to file a certified English-language translation of the Judgment pursuant to Local District Court Rule 5(g).

*[Remainder of Page Intentionally Left Blank]*

WHEREFORE, HTA respectfully requests the Court enter the Proposed Order, attached hereto as **Exhibit A**, permitting it to file the judgments in its original Spanish language, granting it until May 10, 2023 to submit a certified English-language translation of the Judgment, and granting such other and further relief as is just and proper.

Dated: May 5, 2023  
San Juan, Puerto Rico

Respectfully submitted,

/s/ Hermann D. Bauer

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Transportation Authority*

**Exhibit A**

**Proposed Order**

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**Re: ECF Nos. 24103, 23621,  
23612, and 21326.**

**This filing relates only to HTA**

**[PROPOSED] ORDER ON MOTION OF THE PUERTO RICO HIGHWAYS AND  
TRANSPORTATION AUTHORITY FOR LEAVE TO SUBMIT A SPANISH  
LANGUAGE EXHIBIT AND FOR EXTENSION OF TIME TO FILE A CERTIFIED  
TRANSLATION**

Upon consideration of the *Motion of the Puerto Rico Highways and Transportation Authority for Leave to Submit a Spanish Language Exhibit and for Extension of Time to File a Certified Translation* (the “Motion”), filed by the Puerto Rico Highways and Transportation Authority (“HTA”), by and through the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as sole representative of HTA pursuant to section 315(b) of the

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

*Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”)<sup>2</sup>, and dated May 5, 2023, for an order granting HTA leave to submit a Spanish-language version of a Judgment issued by the Commonwealth Court of Appeals dated May 31, 2019, which is in its original Spanish language (the “Judgment”), as Exhibit 2 to the Objection, and an extension of 3 business days, to and including May 10, 2023, to file a certified English translation of the Judgment, as more fully set forth in the Motion; and the Court having jurisdiction to consider the Motion and to grant the relief requested therein pursuant to PROMESA section 306(a); and venue being proper pursuant to PROMESA section 307(a); and notice of the Motion was adequate and proper under the circumstances, and no other or further notice being required; and finding good cause for the requested relief, it is hereby ORDERED that:

1. The Motion is GRANTED as set forth herein.
2. HTA is permitted to file a Spanish-language version of the Judgment.
3. HTA’s certified English-language translation of the Judgment shall be due on or before May 10, 2023.
4. The Court retains exclusive jurisdiction to hear and determine any and all disputes related to or arising from the implementation, interpretation and enforcement of this Order.

Dated: \_\_\_\_\_

\_\_\_\_\_  
LAURA TAYLOR SWAIN  
United States District Judge

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<sup>2</sup> PROMESA is codified at 48 U.S.C. §§ 2101-2241.

**CERTIFICATE OF SERVICE**

I hereby certify that, on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notifications of such filing to all CM/ECF participants in this case.

/s/ Hermann D. Bauer  
Hermann D. Bauer